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*Attorneys for Defendant, Trevor William Ratchford*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

JOAN HELENE RAMOS, an individual,

**Plaintiff,**

vs.

TREVOR WILLIAM RATCHFORD, and  
individual; DOES I through X; and ROE  
CORPORATIONS 1 through 10, inclusive.

Defendant.

Case No.: 2:24-cv-02269-RFB-NJK

## **STIPULATION AND ORDER RE: LIABILITY**

**IT IS HEREBY STIPULATED** by and through the parties hereto, through their respective counsel of record, that the Defendant's negligence was the precipitating factor in causing the automobile collision which is the subject of the above-captioned matter, and is therefore conclusively admitted by Defendant, TREVOR RATCHFORD. Defendant will accordingly

1 [RATCHFORD/RAMOS STIPULATION AND ORDER RE: LIABILITY - 2:24-CV-02269-  
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3 abandon any defenses alleging that Plaintiff, JOAN RAMOS, contributed to the cause of the  
4 subject collision, or was in any way comparatively at fault.  
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6 **IT IS FURTHER STIPULATED** that Defendant, TREVOR RATCHFORD, reserves the  
7 right to challenge and contest, with any available admissible evidence, any and all damage claims  
8 made by Plaintiff, JOAN RAMOS, with respect to their cause, their reasonableness and their  
9 necessity, their viability and the reasonableness of charges relative to the same. Defendant also  
10 reserves the right to assert any and all other defenses to any damages sought by Plaintiff at trial.  
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12 DATED this 15<sup>th</sup> day of May, 2025.

DATED this 15<sup>th</sup> day of May, 2025.

13 THE MERRITT LAW FIRM, PLLC

MAIER GUTIERREZ & ASSOCIATES

15 By: /s/ Michael Merritt  
16 MICHAEL R. MERRITT, ESQ.  
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17 1324 N. Liberty Lake Rd., Ste. 2151  
Liberty Lake, WA 99019  
18 Co-Counsel for Defendant

By: /s/ John Quinn  
JOHN M. QUINN, ESQ.  
Nevada Bar No. 16609  
8816 Spanish Ridge Ave.  
Las Vegas, Nevada 89148  
Attorneys for Plaintiff

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1 [RATCHFORD/RAMOS STIPULATION AND ORDER RE: LIABILITY - 2:24-CV-02269-  
2 RFB-NJK]  
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4 O R D E R

5 IT IS HEREBY ORDERED that TREVOR RATCHFORD's liability for the subject  
6 accident is conclusively established in this case, JOAN RAMOS bears no comparative fault for  
7 causing the subject accident, and that the trial in this matter will proceed on the issues of  
8 damages only.  
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10 Submitted by:  
11

12 THE MERRITT LAW FIRM, PLLC  
13

14 By: /s/ Michael Merritt  
15 MICHAEL R. MERRITT, ESQ.  
16 Nevada Bar No. 5720  
17 1324 N. Liberty Lake Rd., Ste. 2151  
18 Liberty Lake, WA 99019  
19 Co-Counsel for Defendant  
20

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22 RICHARD F. BOULWARE, II  
23 UNITED STATES DISTRICT JUDGE  
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25 DATED this 19th day of May 2025.  
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